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RACINE MAIL ROOM

RACINE COUNTY COURT HOUSE
1931

730 Wisconsin Avenue

RACINE, WISCONSIN

53403

COUNTY EXECUTIVE
DENNIS KORNWOLF

PHONE 414-636-3118
Racine County Courthouse Toll Free
1-800-242-4202

July 22, 1994

Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: Billed Party Preference; CC Docket 92-77

Dear Mr. Secretary:

Enclosed please find the original and nine (9) copies of Comments on the above-noted subject prepared on behalf of Racine County, Wisconsin by County Executive Dennis Kornwolf.

This is a matter of some importance to our County, and we thank you for your kind attention to our Comments.

Sincerely,

Andrea M. Bumpurs
Executive & Legislative Liaison

enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
) CC Docket 92-77
Billed Party Preference)
For 0+ InterLata Calls)

COMMENTS OF RACINE COUNTY, WISCONSIN

These remarks are prepared by the Honorable Dennis Kornwolf, County Executive of Racine County, Wisconsin. Racine County operates a County Jail.

Racine County has several reasons for opposing the adoption of Billed Party Preference: it will replace a system which costs taxpayers nothing to operate and which, in fact, provides revenue used to defray the cost of incarceration with one that will require property-tax dollars to run; it will reduce the availability of phone service to inmates; it will greatly lessen the control we are now able to exert over telephone calls made by inmates in our detention facility; and it represents unwarranted interference with the County's ability to manage and control our detention facility.

Racine County's detention facility currently contracts with an inmate phone provider. The provider supplies as many phones as we request and services them promptly and efficiently. Since the company only makes money if the phones work, it is in their best interest to see that all the phones work all the time.

If Billed Party Preference is adopted, that will no longer be true. The providers of the long-distance service will be determined by the party being called, and their only interest in the transaction is the particular call -- not in what equipment is used. As a result, the County will have to buy telephones,

and will have to pay to have them serviced. Since telephone service in the jail will become an item of cost, it will be subject to all proper budget reviews. This is likely to result in fewer phones being available to prisoners and consequently less time for them to use what phones there are.

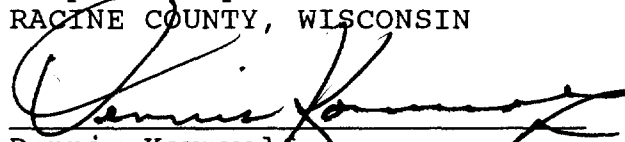
Beside providing the County with phones and equipment repair at no cost, the phone provider supplies other desirable services. Counties have a strong interest in protecting the public from further misconduct by inmates, and the inmate phone provider makes it possible for us to block calls to certain numbers, so that prisoners cannot use the phones to contact victims or witnesses, judges, district attorneys or others who have a need to be protected from unwanted communication with the inmates. Non-contract providers have no interest (unless it is at some fee charged to the County) in providing such services, since they do not know how many of the calls generated at the facility will be billed through their companies. The introduction of Billed Party Preference will thus make the County's job harder and put innocent citizens at risk of harassment.

Finally, the phone service providers pay a percentage of the money generated by the calls to the County. Racine County is currently receiving about \$68,000 a year from inter-lata calls. This money is used to defray the costs of incarceration, a significant factor for us since the Wisconsin legislature has imposed a tax-rate freeze on counties. The only way we can raise revenue levels is by the increased value of property in the County. The \$68,000 we make on inter-lata calls is money that the taxpayers of Racine County are now able to spend on other tax-supported expenses, including improvements to the jail and

social programs for inmates.

There are simply no reasons why Billed Party Preference is beneficial to those who pay the costs of operating correctional facilities. The small amount to be saved by anyone accepting collect calls from an inmate over the length of that inmate's incarceration is greatly outweighed by the cost to the taxpayers of eliminating the cost-effective, revenue-producing, harassment-protecting system currently in use. More significant for those maintaining contact with prisoners is the fact that the small amount to be saved has to be balanced against the overwhelming likelihood that without inmate phone providers there will be fewer phones for inmates to use and consequently less time for any one inmate to make calls.

Respectfully submitted
RACINE COUNTY, WISCONSIN

A handwritten signature in black ink, appearing to read "Dennis Kornwolf", is written over a horizontal line.

Dennis Kornwolf
County Executive
730 Wisconsin Avenue
Racine, WI 53403